

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Frank Joseph Keough and  
Maria Concetta Keough,**

**Debtors**

**Case # 19-13280**

**CHAPTER 13**

**CERTIFICATE OF NO RESPONSE AND  
REQUEST FOR ENTRY OF ORDER**

I, Charles Laputka, Esquire, counsel for the Debtor, hereby certify the following:

1. The Motion for Modification of Plan Post Confirmation was timely served on all interested parties as is shown on the certificate of service previously filed with the Motion.
2. The deadline for response to the Motion was January 8, 2021.
3. No objections, responses, or requests for hearing on the Application have been received, and as of January 12, 2021, a check of the electronic entries docketed in this case confirms that no objections, responses, or requests for hearing on the Application have been filed.

WHEREFORE, Movant seeks the entry of the proposed order filed with the motion, granting the requested relief.

Dated: January 12, 2021

/s/ Charles Laputka, Esquire  
CHARLES LAPUTKA, Esquire  
PA I.D. No. 91984  
1344 West Hamilton Street  
Allentown, PA 18102  
Phone: (610) 477-0155  
Facsimile: (484)350-3581